

FF.5 Timespan from ROD signature to RA Start**Section 1 - Program Activity Information**

1.1 Program Activity: Timespan from Record of Decision (ROD) signature to Remedial Action (RA) Start

1.2 Program Activity Category: GPRA Annual Performance Measure

1.3 Program Area: Federal Facility

1.4 EPA Sponsor:

Subject Matter Expert	Subject Area	Phone #
Josh Barber	Federal Facility	(703) 603-0265

Section 2 - Problem/Decision Objective

2.1 Problem: SARA Section 120(e) states that “substantial, physical, on-site remedial action shall be commenced at each Federal facility no later than 15 months after completion of the investigation and study.” The objective of this measure is to focus attention on the statutory requirement for an RA start within 15 months of the ROD signature.

2.2 Stakeholder(s): Headquarters Remedy staff, Regional IMCs, RPMs, Site Managers, Congress and the Public.

2.3 Decision-maker(s): Regions are responsible for data entry into WasteLAN the completion dates for the ROD and the information for the commencement of the associated RA Start actual date. Users with roles that allow data entry on the project schedule are permitted to enter the required data for these decisions.

2.4 Decision: The performance measure computes the duration between the actual completion date entered at the ROD with the corresponding RA Start date. The duration of ROD to RA Start will be calculated based on the actual completion date of the ROD (Action name = Record of Decision) and the actual start date of the RA (Action name = FF RA) as entered on the WasteLAN project schedule. The ROD signature date will be used as the ROD actual completion date. An RA (or RCRA Corrective Measure) start is the date on which substantial, continuous, physical on-site remedial actions begin pursuant to SARA Section 120(e) as documented by a memo or letter to EPA. This date is reported in WasteLAN as the actual RA (Action Name = FF RA) or CMI (Action Name = Corrective Measure Implementation) start date.

Sites for which the duration exceeds the 15 month requirement will be identified. Comparisons will be made to previous Agency performance to determine trends.

Section 3 - Information Needs

Name	Source	System	Table/Column
Site	ROD document	WasteLAN	Site/Site_Id
Record of Decision	ROD document	WasteLAN	Action/rat_code, act_code_id where rat_code = 'RO'
ROD Completion date	ROD document	WasteLAN	Action/act_actl_cmpltn_date is NOT null
Anomaly/Takeover Code for ROD	Takeover documentation	WasteLAN	Action.raa_code <> 'PC' OR 'PB' OR 'TO' OR 'TT' OR 'OA' OR 'OC'
Action Lead Code	WasteLAN	WasteLAN	action.ralt_code = 'FF'
RA start documentation	memo or letter to EPA documenting substantial, continuous, physical on-site remedial actions began	WasteLAN	Action/rat_code, act_code_id where rat_code = 'LY'
RA Start date	memo or letter to EPA documenting substantial, continuous, physical on-site remedial actions began	WasteLAN	Action/act_actl_strt_date within user selected range
Anomaly Code		WasteLAN	Action.raa_code <> 'PC' OR 'PB' OR 'TO' OR 'TT' OR 'OA' OR 'OC'
Lead Code		WasteLAN	action.ralt_code = 'FF'

Section 4 - Scope/Universe

This measure addresses only Federal facility sites with final ROD signatures and RA Starts entered into WasteLAN.

Section 5 - Data Quality Requirements

5.1 Completeness: In order to compute the duration, a ROD action (RO) must exist on the project schedule for the site and have an actual completion date, AND an RA action (FF RA) must exist in the project schedule for the site with an actual start date. The DQO applies to all Federal facility sites in CERCLIS with a final ROD signature and a FF RA start date entered into WasteLAN. Site without FF RA actual start dates will be identified.

- DQO applies to all Federal Facilities Sites in CERCLIS with signed RODs

5.2 Accuracy: The ROD completion is the date the final ROD was signed and the RA start is the RA start is the date on which substantial, continuous, physical on-site remedial actions begin pursuant to SARA Section 120(e) as documented by a memo or letter to EPA. There is objective evidence (documentation that a third party can examine and arrive at the same conclusion) to support the accomplishment of this measure.

- Most Accurate - Data reported in official decision source document

- 5.3 Timeliness: This measure is based on the ROD and FF RA actions, therefore, it's timeliness is dependent on that required for those actions. The HQ data sponsors reviews the data for this DQO semi-annually and contacts the appropriate regional staff to address any outstanding issues. Regions enter action information real time. Although the GPRA measure is counted at fiscal year end, the action data should be entered in a timely basis (within 5 working days of actual start/completion/signature of decision documentation).
- 5.4 Consistency: There are clear national definitions and guidance. Guidance on this measure is available in the Superfund Program Implementation Manual.
Most Consistent - National Guidance and definitions have been distributed.

Section 6 - Information Collection and Reporting

- 6.1 Source for the information: ROD, RA start documentation (memo or letter to EPA noting that substantial, continuous, physical on-site remedial actions have begun at the site).
- 6.2 User interface: User enters actions and actual completion dates for ROD and FF RA actions on the project schedule screen.
- 6.3 System transfers: This information is snapshot from region to Headquarters.
- 6.4 Internal outputs: SCAP-14 Federal Facility; Federal Facility Accomplishment Report
- 6.5 Audit reports: Federal Facility Audit Report
- 6.6 External outputs: reported annually to Congress
- 6.7 Guidance documentation:
- ▶ Superfund Program Implementation Manual (SPIM) – OSWER Directive 9200.3-14-1G-Q